



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/14/2022

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ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

MEMO ENDORSED

April 12, 2022

Via ECF

Hon. Colleen McMahon
United States District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

DC

Re: Rodriguez v. City of New York, et al., 21-CV-8565 (CM) (OTW)

Dear Judge McMahon:

Palmer M. Pal

This Office represents State defendants Gonzalez, Douglas, and Lucas, employees of the New York State Department of Corrections and Community Supervision (“DOCCS”), and respectfully requests a two-week extension of their time to file motion pursuant to this Court’s individual rules part V and V.F.4 from April 20, 2022, until May 4, 2022. The undersigned is involved in time-sensitive litigation concerning the proper application of the recently effective Less is More Act, which substantially changed parole revocation procedures effective March 1, 2022, and will also be unavailable for a week on personal commitments. Plaintiff and City Defendants have consented to extension. This is the first application for an extension of these deadlines.

Accordingly DOCCS Defendants propose the following revised schedule:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Revised Date</u>
DOCCS Defendants’ Moving Papers	April 20, 2022	May 4, 2022
Plaintiff’s Responsive Papers	May 20, 2022	June 3, 2022
DOCCS Defendants’ Reply Papers	June 3, 2022	June 17, 2022

Sincerely,
/s/ David T. Cheng
David T. Cheng
Assistant Attorney General

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